

1 Alfred Clark
2 5613 Harmony Ave.
3 Las Vegas, NV 89107
4 in Propria persona

5 UNITED STATES DISTRICT COURT FOR
6 THE STATE OF NEVADA

7
8 ALFRED CLARK,

9 Plaintiff,

10 vs.

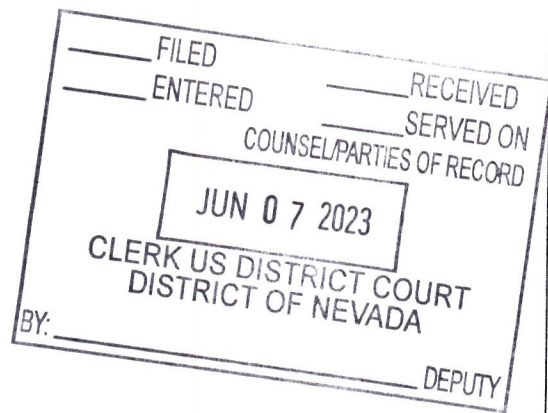
11 US BANK, NATIONAL
12 ASSOCIATION,

13 WESTERN PROGRESSIVE -
14 NEVADA, INC.,

15 PHH MORTGAGE SERVICES

16 Defendant(s).

) Case No. 2:23-cv-00493-GMN-BNW
) MOTION FOR LEAVE TO AMEND



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18 **MOTION FOR LEAVE TO AMEND ORIGINAL COMPLAINT**
19 **MEMORANDUM AND POINTS OF AUTHORITY**

20 Comes now, Alfred Clark, (hereinafter Plaintiff), do depose and say that I am
21 competent to testify and that I have personal, first-hand knowledge of the matters
22 herein, and that I am of the age of majority, and that the contents of this Motion to
23 amend original complaint are true and correct to the best of my knowledge.

24 Plaintiff Respectfully request this court of record to grant this motion for leave to
25 amend original complaint, in addition that of wrongful foreclosure, not limited to
26 insider trading, as defendants have now completed there unlawful foreclosure process
27 the Illegal selling of plaintiff private property commonly known as 5613 harmony Ave.
28 Las Vegas NV 89107, and recorded on or about June 6th of 2023.
29

1 Defendant(s) PHH mortgage (hereafter PHH,) US Bank (hereafter US BANK) and
2 Western progressive hereafter (WP), Have completed there unlawful foreclosure, as
3 there is now new evidence that supports this motion to amend,

4 This motion to amend is timely made and will not prejudice defendants named
5 herein, the same would be an error to refuse permission to amend and deny Plaintiffs
6 right to assert new cause of action with merit, that has been created by the defendants
7 post filing of plaintiffs original complaint see (Morgan v. super.Ct (1959) 172
8 Cal.App.2d 527,530)

9 Plaintiff Alfred Clark respectfully ask this court of record to grant this motion for
10 leave to amend as it is rip as well as warranted.

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12 Sincerely Alfred Clark
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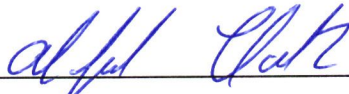
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VERIFICATION OF MOTION FOR LEAVE TO AMEND

Subscribed and affirmed, without prejudice, with all rights reserved, the undersigned, Alfred Clark, Principal, declares under penalty of perjury, under the laws of the United States of America, states as follows: All the facts herein are true, correct of my own personal knowledge.

IN WITNESS WHEREOF I hereunto set my hand and seal on this

7 day of June, 2023 and here
by certify all the statements made above are true, correct and complete.



Alfred Clark

5613 Harmony Ave

Las Vegas, NV 89107


ORDER

IT IS ORDERED that ECF No. 21 is DENIED without prejudice for failure to comply with LR 15-1 ("Unless the court orders otherwise, the moving party must attach the proposed amended pleading to a motion seeking leave of the court to file an amended pleading. The proposed amended pleading must be complete in and of itself without reference to the superseded pleading and must include copies of all exhibits referred to in the proposed amended pleading.").

IT IS FURTHER ORDERED that the parties must meet and confer regarding Plaintiff's motion to amend the complaint by June 23, 2023. See LR 16-1(d) ("Unless the court orders otherwise, the moving party must attach the proposed amended pleading to a motion seeking leave of the court to file an amended pleading. The proposed amended pleading must be complete in and of itself without reference to the superseded pleading and must include copies of all exhibits referred to in the proposed amended pleading."). If the parties agree, they may file a stipulation; otherwise, Plaintiff may refile his motion to amend along with a meet-and-confer certification and his proposed amended complaint.

CERTIFICATE OF SERVICE

I certify that a copy of this motion for leave to amend and any attachments was served by USPS mail on the persons listed below:


Signature

Wright, Finlay & Zak, LLP
7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117

Date Served 6/7/2023